

# EXHIBIT B

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF PENNSYLVANIA**

Bobrick Washroom Equipment, Inc.,

*Plaintiff*

v.

Scranton Products, Inc.,

*Defendant*

Civil Action No. 3:14-CV-00853-RDM

Hon. Robert D. Mariani

**AFFIDAVIT OF DAN FRAME**

1. I, Dan Frame, declare as follows:
2. I am Vice President – Partitions and Cubicles at Bobrick Washroom Equipment, Inc.
3. My role at Bobrick is overseeing Bobrick's profit and loss, business development, and new product development for its toilet partitions business.
4. I am not familiar with Scranton Products, Inc.'s marketing and advertising of toilet partitions as "E84," "Class A," or "Class B" compliant, as alleged in Bobrick's Third Enforcement Action.
5. I was not involved in the decision to bring the Third Enforcement Action against Scranton Products, and have not been involved in any discussions or decisions concerning the Third Enforcement Action.
6. I do not intend to testify at the evidentiary hearing on Bobrick's Third Enforcement Action.

7. I therefore do not have information relevant to the Third Enforcement Action.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on May 29, 2024 in North Hollywood, California.

/s/ *Dan Frame*  
Dan Frame